

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	351150
<015>	Study Area Name	DIXON TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Kent Dau
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5632859611 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	kent@cstech.com
Form Type		54.313 and 54.422

<010>	Study Area Code	351150
<015>	Study Area Name	DIXON TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Kent Dau
<035>	Contact Telephone Number - Number of person identified in data line <030>	5632859611 ext.
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No

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**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	351150
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<035>	Contact Telephone Number - Number of person identified in data line <030>	5632859611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
351150ia510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	351150ia610.pdf

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-- See attached worksheet --

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com
<810>	Reporting Carrier	Dixon Acquisition LLC
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Dixon Acquisition LLC

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	5632859611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@estech.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

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<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 351150ia1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 351150ia1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com

351150ia1210.pdf

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP <http://centralscott.com/lifeline>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | | |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

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Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	351150ia3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>	
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
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<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: DIXON TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2017
Printed name of Authorized Officer: Kent Dau	
Title or position of Authorized Officer: CFO	
Telephone number of Authorized Officer: 5632859611 ext.	
Study Area Code of Reporting Carrier: 351150	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

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<039> Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FCC Form 481, Line 510: Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

Iowa Administrative Code §199-22.6 requires an ETC to certify in its annual report that it is complying with applicable service quality standards and consumer protection rules. The ETC will measure its service connection, held order, and service interruption performance monthly according to this section. Dixon Acquisition LLC certifies that it has complied with these requirements and will continue to comply with these requirements.

FCC Form 481, Line 610: Certification Regarding Ability to Function in Emergency Situations

Iowa Administrative Code §199-22.6(5) requires an ETC to certify in its annual report that it is complying with provisions to meet emergencies including, but not limited to, the provision of emergency power. Each central office shall contain a minimum of two hours of battery reserve and for offices without permanently installed emergency power facilities, there shall be access to a mobile power unit with enough capacity to carry the load which can be delivered on reasonably short notice and readily connected. Dixon Acquisition LLC certifies that it has complied with these requirements and will continue to comply with these requirements.

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<020>	Program Year	2018
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<030>	Contact Name - Person USAC should contact regarding this data	Kent Dau
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<035>	Contact Telephone Number - Number of person identified in data line <030>	5632859611 ext.
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<039> Contact Email Address - Email Address of person identified in data line <030> kent@cstech.com

<702> Single State-wide Residential Local Service Charge

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<810>	Reporting Carrier	Dixon Acquisition LLC
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Dixon Acquisition LLC

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Bretton Woods Telephone Company, Inc.	120038	Bretton Woods, World Surfer
	Upper Peninsula Telephone Company	310732	Michigan Broadband Services, UPTC, MCBC, Alphacomm.net
	Michigan Central Broadband Company	310785	Michigan Broadband Services, MCBC, Alphacomm.net
	Belmont Telephone Company	330847	Belmont, LaGrant Connections, LLC
	Cuba City Telephone Exchange Company	330872	Cuba City, LaGrant Connections, LLC
	Central Scott Telephone Company	351125	Central Scott
	CST Communications, Inc.	359032	CST Communications, iWireless
	Dixon Acquisition LLC	351150	Central Scott, Dixon Telephone Company
	Haviland Telephone Company, Inc.	411780	Haviland, Giant Communications, Inc.
	J. B. N. Telephone Company, Inc.	411785	J.B.N., Giant Communications, Inc.
	Western New Mexico Telephone Co., Inc.	492268	WNM Communications
	Central Utah Tel Inc.	502277	Centracom, CentraCom Interactive
	Skyline Telecom	502283	Centracom, CentraCom Interactive
	Bear Lake Comm	503032	Centracom, CentraCom Interactive
	Cal-Ore Telephone Company	542311	Cal-Ore
	Giant Communications, Inc.		Giant
	Alpha Enterprises Limited, Inc.		Alphacomm.net
	World Surfer, Inc.		World Surfer
	INTERCOMMUNITY TELEPHONE COMPANY	381616	InterCommunity
	Valley Communications, Inc.		Valley
	Central Telcom Services, LLC		Centracom, CentraCom Interactive
	LaGrant Connections, LLC		LaGrant Connections, LLC
	WNM Communications Corporation		WNM Communications

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

OMB Control No. 3060-0986/OMB Control No. 3060-0819

<010>	Study Area Code	351150
<015>	Study Area Name	DIXON TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Kent Dau
<035>	Contact Telephone Number - Number of person identified in data line <030>	5632859611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@cstech.com
<810>	Reporting Carrier	Dixon Acquisition LLC
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Dixon Acquisition LLC

[illegible]

File name: 351150ia1010.pdf

Dixon Acquisition LLC
Line 1010 – Voice Services Rate Comparability

As required in 47 C.F.R. § 54.313(a)(10), any recipient of high-cost support shall provide a letter certifying that the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice services, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The following provides the Company's support for Line 1010 - Description of Voice Service Rate Comparability.

As of January 1, 2017, the Company charges the following fixed voices prices:

Flat Rate Residential Service	\$18.00
State Residential Subscriber Line Charge	0.00
State Universal Service Charge Fee	0.00
Mandatory Extended Area Service	0.00
Residential Federal Subscriber Line Charge	<u>6.50</u>
Total Residential Fixed Voice Charges	<u>\$24.50</u>

Since the total for basic residential fixed voice that the Company charges, as shown above, is above the 2016 rate floor for voice services of \$22.49 and below the reasonable comparability benchmark for voice services of \$49.51, announced by the FCC Wireline Competition Bureau in the Public Notice released on February 14, 2017 (DA 17-167), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(10).

FCC Form 481, Line 1030: Broadband Comparability Certification

Dixon Acquisition LLC

In a December 2014 Order (FCC 14-90), paragraphs 119-123, the FCC created Section 54.313(a)(12) which requires recipients of High Cost Program and/or Connect America Fund support that are subject to broadband performance obligations to submit a broadband reasonable comparability rate certification.

The following provides the Company's support for Line 1020 - Description of Broadband Service Rate Comparability.

As of January 1, 2017, the Company charges the following residential broadband price:

Download Speed	12Mbps
Upload Speed	1Mbps
Usage Allowance	Unlimited
Price	\$44.00

Since the total for residential broadband that the Company charges, as shown above, is below the \$77.98 for 10 Mbps x 1 Mbps service with the unlimited usage allowance, which is the reasonable comparability benchmark for broadband service announced by the FCC Wireline Competition Bureau in the Public Notice released on February 14, 2017 (DA 15-470), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(12).

FCC Form 481, Line 1210: Terms and Condition for Lifeline Customers

Lifeline Telephone Assistance Program

Financial assistance through the Lifeline program is available to help eligible Iowans afford and maintain basic telephone service. Lifeline participation enables Iowans to stay connected to jobs, family, community resources, and government and emergency services. Lifeline is a federal government program that assists qualified Iowans by providing a monthly credit of \$9.25 on the local telephone bill.

The Lifeline program has recently been streamlined by the Federal Communications Commission. Lifeline benefits are now limited to one wire line or wireless phone per qualified household. Households currently receiving more than one Lifeline service must select a single Lifeline service provider and de-enroll from the program with any other provider(s).

Households eligible for or already receiving Medicaid, the Supplemental Nutrition Assistance Program, Supplemental Security Income Program, Federal Public Housing Assistance Program, Low-Income Home Energy Assistance Program, Temporary Assistance to Needy Families Program, or the National School Lunch Program may qualify. Consumers may also qualify based on their level of income. For more information, please see the Board's [2014 Lifeline Week news release](#).

A Lifeline [application form](#) is available from your local telephone service provider, the Iowa Utilities Board, or most [Community Action Agencies](#) in the state. To apply, simply complete the application form and then return it to your chosen participating provider. Additionally, residents of Tribal lands who are eligible for Lifeline, should check with their local telecommunications provider to inquire about additional benefits, including potential Link-Up telephone-installation benefits.

Re-certification forms are sent to all Lifeline subscribers each year. In order to continue receiving Lifeline assistance, these forms must be completed and returned to the subscriber's local telecommunications provider within 30 days. If the re-certification form is not returned, the telecommunications provider will discontinue the subscriber's Lifeline assistance.

Information about the [number of customers receiving Lifeline assistance](#) is reported by each Iowa telephone company. For more information, call the Iowa Utilities Board toll free at 1.877.565.4450, or visit www.fcc.gov/lifeline or www.usac.org.

Number of local minutes provided: Unlimited local calling

Equal access toll calls are available and are billed at carriers' standard rates for Lifeline subscribers.

File name: 351150ia3010.pdf

Dixon Acquisition LLC
Line 3010 – Certification of Public Interest Obligations

As required in 47 C.F.R. § 54.313(f)(1)(i), any rate-of-return ETC receiving support must certify it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time.

With this document, the Company hereby certifies that it has taken reasonable steps as summarized in the FCC rules and regulations shown on the following pages to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

Primary FCC Orders Relating to “Reasonable Requests” for Broadband Service

In its 2011 *USF/ICC Transformation Order*¹ the Commission required rate-of-return carriers receiving Universal Service Fund (USF) support to provide their customers with “at least the same initial minimum level of broadband service as those carriers who receive model-based support”² Recognizing RLECs’ generally small size, however, the Commission determined these carriers “should be provided greater flexibility in edging out their broadband-capable networks in response to consumer demand.” More specifically, the Commission stated that, “[u]pon receipt of a reasonable request for service, carriers must deploy broadband to the requesting customer within a reasonable amount of time.”³

In its 2012 *Third Order on Reconsideration*,⁴ the Commission clarified that its rules “provide sufficient flexibility to take into account any unique circumstances that may impact the ability of rate-of-return companies to extend broadband to their customers, including backhaul costs.”⁵

Later, in its 2014 *Seventh Order on Reconsideration*, the Commission acknowledged that there remained “some ambiguity” as to what would constitute an unreasonable request for service.⁶ It accordingly included a *Declaratory Ruling* to clarify matters.⁷

The *Declaratory Ruling* first suggests that rate-of-return carriers evaluating a request to extend broadband service should consider:

¹ See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17663 (2011) (*USF/ICC Transformation Order*).

² *Id.* ¶ 206.

³ *Id.* ¶ 208.

⁴ See *Connect America Fund et al.*, WC Docket No. 10-90, *et. al.*, Third Order on Reconsideration, 27 FCC Rcd. 5622 (2012) (*Third Order on Reconsideration*).

⁵ *Id.* ¶ 46.

⁶ *Connect America Fund*, WC Docket No. 10-90, *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 29 FCC Rcd. 1175 (2014) ¶ 64 (*Seventh Order on Reconsideration*).

⁷ *Id.* ¶ 59.

whether it would be reasonable to make the necessary upgrades in light of anticipated end-user revenues from the retail provision of broadband service and other sources of revenues, including but not limited to federal or state universal service funding projected to be available under current rules. In considering end-user revenues, carriers should take into account the reasonable comparability benchmark for broadband services. If the incremental cost of undertaking the necessary upgrades to a particular location exceed the revenues that could be expected from that upgraded line, a request would not be reasonable.⁸

The Declaratory Ruling then specifically relates determination of unreasonable requests to the \$250/line cap on total high cost support imposed by the 2011 USF/ICC Transformation Order:

[A] request is not reasonable if it would require a carrier to undertake new network upgrades to install new backhaul facilities or to replace existing copper lines to the home with fiber merely for the purpose of newly providing broadband service in study areas where total support already is subject to the \$250 per line monthly cap. Moreover, we declare that a request is not reasonable if it would require a carrier to undertake new network upgrades to newly provide broadband service to requesting customers if that would cause total monthly support that presently is under the \$250 cap to exceed the cap⁹

The Commission also made clear a rate-of-return carrier has no obligation to extend broadband-capable infrastructure in any census block that is served by an unsubsidized competitor that meets the Commission's current performance standards.¹⁰

At the time the *Declaratory Ruling* was issued, the Commission was also considering whether to revise its broadband performance obligations to require higher speeds, such as 10Mbps downstream.¹¹ The Commission reiterated, however, that if minimum speed requirements were increased, a rate-of-return carrier would only be required to provide the higher speed service if the request was reasonable:

In determining whether a particular upgrade is cost effective, the carrier should consider not only its anticipated end-user revenues from the services to be offered over that network, both voice and retail broadband internet access, but also other sources of support, such as federal and, where available, state universal service funding. Under our proposal to increase the minimum downstream speed threshold, we thus would not expect a rate-of-return carrier immediately to upgrade its entire existing infrastructure

⁸ *Id.* ¶ 65.

⁹ *Id.* ¶ 67.

¹⁰ *Id.* ¶ 68.

¹¹ *Id.* ¶ 138.

to provide 10 Mbps downstream and 1 Mbps upstream (10 Mbps/1 Mbps) to all current customers. Rather, we propose that rate-of-return carriers would take into account any revised speed standards when considering whether and where to upgrade existing plant in the ordinary course of business and would report on progress toward this goal in preparing annual updates to their five-year service improvement plans.¹²

In a *Report and Order* released December 18, 2014 the Commission adopted several measures to address non-compliance with its CAF deployment obligations.¹³ Noting that rate-of-return carriers were required to build out their networks only on “reasonable request,” the Commission determined that non-compliance issues for RLECs should be dealt with on a case-by-case basis.¹⁴ (This differs significantly from the strict milestone-based measures applicable to other eligible telecommunications carriers (ETCs).)

The Commission further clarified that rate-of-return carriers “should report any requests that are deemed unreasonable as unfulfilled requests in their section 54.313 annual reports.”¹⁵ USAC is expected to verify that rate-of-return carriers have sufficient evidence to demonstrate that any unfulfilled requests were in fact unreasonable.¹⁶ To the extent USAC determines that insufficient evidence to support a denial of service, such finds shall be reported as “other matters.”¹⁷

¹² *Id.* ¶ 144.

¹³ *Connect America Fund*, WC Docket No. 10-90, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Obsolete ILEC, Regulatory Obligations that Inhibit Deployment of Next-Generation Networks*, WC Docket No. 14-192, Report and Order, FCC 14-190 (rel. Dec. 18, 2014) (*Report and Order*).

¹⁴ *Id.* ¶ 143.

¹⁵ *Id.* ¶ 153.

¹⁶ *Id.*

¹⁷ *Id.*